

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SONY MUSIC ENTERTAINMENT,

Plaintiff,

- against -

LEGACY RECORDS NYC, LLC, and  
DELICIOUS HOSPITALITY, LLC,

Defendant.

Case No. 18 Civ.01976 (PKC)

**AFFIDAVIT OF  
ELEANOR M. LACKMAN**

STATE OF NEW YORK     )  
                                      ) ss:  
COUNTY OF NEW YORK    )

ELEANOR M. LACKMAN declares as follows:

1. I am a Partner with the law firm of Cowan, DeBaets, Abrahams & Sheppard LLP, counsel for plaintiff Sony Music Entertainment in the above-captioned action. I submit this affidavit in support of the parties' joint application to this Court for permission to file under seal the agreement dated August 27, 2018.

2. On or around August 27, 2018, plaintiff Sony Music Entertainment and defendants Legacy Records NYC, LLC and Delicious Hospitality, LLC (collectively, the "Parties") entered into an agreement resolving the matters pertaining to the above-captioned action (the "Agreement"), the terms of which are confidential.

3. In the Stipulation of Settlement and Proposed Order of Dismissal with Prejudice dated September 4, 2018 (Dkt. No. 28), the Parties advised the Court of such Agreement and requested that the Court retain jurisdiction to enforce the Agreement's terms.

4. The Agreement contains a mutual confidentiality provision requiring, in general, that all Parties keep the terms of the Agreement confidential.

5. The Agreement was not previously filed with the Court and was not the basis for this Court's adjudication.

6. The Parties continue to desire that the Court retain jurisdiction to enforce the terms of the Agreement and are prepared to file such Agreement with the Court.

7. In order to permit the Court to retain jurisdiction to enforce the terms of the Agreement without violating the confidentiality provision in the Agreement, the Parties respectfully request the Court's permission to file the Agreement under seal.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

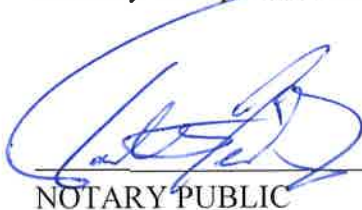
Dated: New York, New York  
September 10, 2018



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ELEANOR M. LACKMAN

Sworn to before me this  
10th day of September, 2018

  
NOTARY PUBLIC

JONATHAN PERITZ  
Notary Public, State of New York  
No. 02PE6327853  
Qualified in Kings County  
Commission Expires July 20, 2019